

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENNEY MANUFACTURING CO.,

Plaintiff,

v.

SATORI HOME LIMITED, LLC,

Defendant.

CIVIL ACTION NO.: 1:25-cv-356

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff KENNEY MANUFACTURING COMPANY. (“Kenney”), as and for its Complaint against SATORI HOME LIMITED, LLC. (“Satori”), alleges as follows:

NATURE OF THE CASE

1. This is a civil action for infringement of Kenney’s United States Patent No. 11,185,185 (‘185 Patent) under the Patent Act, 35 U.S.C. § 271, based on Satori’s unauthorized commercial manufacture, distribution, use, importation, offer for sale, and sale of Walmart’s Mainstays SwiftSet No Drill $\frac{1}{2}$ ” to 1” Diameter Curtain Rod Brackets (the “Accused Products”) online and in stores throughout the United States and within the Northern District of Illinois as shown below.



Walmart's Mainstays Swiftset No Drill Black $\frac{1}{2}$ " to 1" Diameter Curtain Rod Brackets



Walmart's Mainstays Swiftset No Drill Silver $\frac{1}{2}$ " to 1" Diameter Curtain Rod Brackets

2. This action arises from Satori's infringement of Kenney's rights under the '185 Patent. Satori has infringed, and continues to infringe, on Kenney's rights under the '185 Patent by manufacturing, selling and marketing the Accused Products.

PARTIES, JURISDICTION AND VENUE

3. Plaintiff Kenney is a Rhode Island corporation with its principal place of business at 1000 Jefferson Boulevard, Warwick, Rhode Island 02886.

4. Defendant Satori Home Limited, LLC. is a New Mexico entity with its principal place of business at 1578 Sherman Ave., Evanston, Illinois 60201. The Accused Products are marked with the trademark “SwiftSet” – which is filed under a U.S. Federal Trademark Application No. 97635352 owned by Satori Home Limited, LLC with an address of 1578 Sherman Ave., Evanston, Illinois 60201.

5. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Satori because Satori’s principal place of business is located within the District and Satori has continuous and systemic contacts with the State of Illinois, including by conducting substantial and regular business therein through the manufacture, sale and marketing of products, including the products at issue in this action.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(b) because Satori has its regular and established place of business within the District and has manufactured, sold, and marketed infringing products online and at Walmart stores within the Northern District of Illinois.

FACTS

I. KENNEY’S BUSINESS AND INTELLECTUAL PROPERTY

A. Kenney’s Business

8. Founded in 1914, Kenney is a privately held family-owned company, recognized as a leading manufacturer of window drapery hardware and bath and storage products.

9. For over 100 years Kenney has manufactured and distributed many of its products in the United States from facilities in Rhode Island and Arkansas. Kenney is proud to employ hundreds of talented and hardworking American workers.

10. Kenney continues to invest in American manufacturing by adopting new technology to maintain its market position, produce outstanding products that consumers desire, and maintain a valuable workforce that manufactures those products in the United States.

11. Kenney's manufacturing operations also support hundreds of other companies in its supply chain and the communities that rely on those companies.

12. Kenney's window drapery hardware is highly regarded by consumers in the United States and has been sold by leading national retailers for over forty years.

13. Kenney continues to innovate and deliver improved products from its American factories, a competitive advantage that comes from its U.S. workforce and the ability to patent its products.

B. Kenney's Patented Products

14. On November 30, 2021, the United States Patent and Trademark Office ("USPTO") duly and legally issued U.S. Patent No. 11,185,185 (the '185 patent"), entitled "Configurable Mounting Bracket For Curtain Rods," invented by Jeffrey Klowan and Thomas Borawski and assigned to Kenney. A true and accurate copy of the '185 patent is attached as **Exhibit A** to this Complaint.

15. Upon information and belief, Satori makes, uses, sells, and/or offers to sell and induces others to make, use, sell, and/or offer to sell curtain rod mounting brackets (the Accused Products) that embody and/or use the inventions as claimed in the '185 patent.

16. The Accused Products are offered for sale and sold throughout the United States, including without limitation, online and at Walmart stores, where the Accused Products are sold as the “Mainstays SwiftSet No Drill ½” to 1” Diameter Curtain Rod Brackets” in black and silver.

COUNT I

Infringement of U.S. Patent No. 11,185,185

17. Kenney incorporates by reference the allegations set forth in Paragraphs 1 through 16 as though fully set forth herein.

18. The USPTO duly and legally issued, and Kenney holds all right, title, and interest in and to, the '185 patent.

19. The '185 patent is in full force and effect and is valid and enforceable.

20. Upon information and belief, Satori has infringed and continues to infringe at least Claim 1 of the '185 patent by, *inter alia*, making, using, selling, offering for sale, and/or importing the Accused Products.

21. Satori's actions constitute direct infringement of the '185 patent, either literally or under the doctrine of equivalents.

22. Upon information and belief, Satori continues to engage in its infringing activities, including inducing infringement of the '185 patent among its distributors, retailers, resellers, customers, users, and/or licensees of the Accused Products.

23. The Accused Products have no substantially non-infringing use.

24. Kenney has not licensed or authorized any of Satori's actions, either expressly or by implication, and Satori has no license to practice the '185 patent.

25. Satori's infringing conduct has injured and continues to injure Kenney, and Kenney is entitled to damages adequate to compensate it for such infringement.

26. Satori's infringing conduct has caused and continues to cause irreparable injury to Kenney, for which remedies at law are inadequate to compensate it, such that the issuance of a permanent injunction against Satori's further manufacture, use, sale, importation, and/or offer for sale of products that infringe any of the '185 patent is warranted.

PRAYER FOR RELIEF

WHEREFORE, Kenney prays for an Order, Judgment, and Injunction, as follows:

- A. On each Claim, judgment in favor of Kenney and against Satori, along with costs and attorneys' fees;
- B. For entry of a preliminary injunction prohibiting further infringement of the '185 patent by Satori, its agents, employees, representatives, successors, and assigns and those acting in concert or privity with them;
- C. For an award of actual damages against Satori for damages arising from the infringement of the '185 patent;
- D. For a declaration that this case is exceptional under 35 U.S.C. § 285, and for the award of treble damages, attorneys' fees, and the costs of the action pursuant to that statute;
- E. For an award of pre-judgment and post-judgment interest pursuant to 35 U.S.C. § 284 and 28 U.S.C. § 1961 at the maximum rate allowed by law; and
- F. For such other and further relief as the Court considers fair and just.

JURY DEMAND

Kenney Manufacturing Co. demands a trial by jury on all claims and issues so triable.

Date: January 13, 2025

Respectfully submitted,

PLAINTIFF KENNEY MANUFACTURING CO.,
By its attorneys,

/s/ Monica A. Mark

Paul J. Stockhausen, Bar ID#: 1034225
pstockhausen@reinhartlaw.com
Monica A. Mark, Bar ID#: 1082428
mmark@reinhartlaw.com
Reinhart Boerner Van Deuren s.c.
22 East Mifflin Street, Suite 700
Madison, WI 53703
Tel: (608) 229-2200
Fax: (608) 229-2100

ADLER POLLOCK & SHEEHAN P.C.
100 Westminster Street, 16th Floor
Providence, RI 02903
Jeffrey K. Techentin
jtechentin@apslaw.com
Todd D. Amaral
tamaral@apslaw.com
Tel: 401-274-7200
Fax: 401-751-0604

Pro hac vice motions to be filed